

as/ 2023R00394

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Criminal No. 23- *594 (AK11)*  
v. : 18 U.S.C. § 1349  
ERASMO FELICIANO : 18 U.S.C. § 371  
: 18 U.S.C. § 1708

**INFORMATION**

The defendant having waived in open court prosecution by Indictment, the United States Attorney for District of New Jersey charges:

**Count One**  
**(Conspiracy to Commit Bank Fraud)**

From on or about May 4, 2018 through in or about February 2020, in Gloucester County, in the District of New Jersey and elsewhere, the defendant,

ERASMO FELICIANO,

did knowingly and intentionally conspire and agree with K.M., W.L., and others, to execute a scheme and artifice to defraud financial institutions, namely Truist Bank, Republic Bank, Bank of America Corp., TD Bank N.A., OceanFirst Bank, N.A., and others, the deposits of which were then insured by the Federal Deposit Insurance Corporation, and to obtain moneys, funds, assets, and other property owned by, and under the custody and control of, such financial institution, by means of materially false and fraudulent pretenses, representations, and promises, contrary to Title 18, United States Code, Section 1344.

In violation of Title 18, United States Code, Section 1349.

**Count Two**  
**(Conspiracy to Steal a U.S. Postal "Arrow" Key)**

1. On or about November 22, 2022, in Camden County, in the District of New Jersey and elsewhere, the defendant,

ERASMO FELICIANO,

did knowingly and intentionally conspire and agree with others, to commit an offense against the United States, that was to steal, purloin, embezzle, and obtain by false pretense any key suited to any lock adopted and in use at the time by the United States Post Office Department and the Postal Service, and in use on any of the mails and bags thereof, and any key to any lock box, lock drawer, and other authorized receptacle for the deposit and delivery of mail matter, contrary to Title 18, United States Code, Section 1704.

**Object of the Conspiracy**

2. It was the object of the conspiracy for defendant ERASMO FELICIANO to use the stolen Postal Service key to steal mail matters containing checks from mail collection boxes and deposit those checks at various financial institutions that he and his conspirators controlled to unjustly enrich themselves.

**Overt Acts**

3. In furtherance of the conspiracy and to effect its object, defendant ERASMO FELICIANO and his co-conspirators, both known and unknown, committed the following acts, among others, in the District of New Jersey and elsewhere:

- a. On a date on or before November 22, 2022, a co-conspirator of the defendant, ERASMO FELICIANO, and who was a United States letter carrier, offered to steal an arrow key.

- b. On or about November 22, 2022, defendant ERASMO FELICIANO offered to purchase a U.S. Postal Arrow Key from a co-conspirator.
- c. On or about November 22, 2022, a co-conspirator travelled to the District of New Jersey with a U.S. Postal Arrow Key which was stolen from the United States Post Office Department and the Postal Service.
- d. On or about November 22, 2022, defendant ERASMO FELICIANO purchased a stolen U.S. Postal Arrow Key from a co-conspirator while in the District of New Jersey.

In violation of Title 18, United States Code, Section 371.

**Count Three**  
**(Theft or Receipt of Stolen Mail Matter)**

On or about November 22, 2022, in the Eastern District of Pennsylvania and elsewhere, the defendant,

ERASMO FELICIANO,

did knowingly steal, take, and abstract, and by fraud and deception obtain any letter, postal card, package bag, and mail, and any article and thing contained therein which has been left for collection upon and adjacent to a collection box and other authorized depository of mail matter.

In violation of Title 18, United States Code, Section 1708.



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PHILIP R. SELLINGER  
United States Attorney

CASE NUMBER:

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**UNITED STATES OF AMERICA**

**v.**

**ERASMO FELICIANO**

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**INFORMATION FOR**

**18 U.S.C. § 1349  
18 U.S.C. § 371  
18 U.S.C. § 1708**

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**PHILIP R. SELLINGER  
UNITED STATES ATTORNEY  
FOR THE DISTRICT OF NEW JERSEY**

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**ALISA SHVER  
ASSISTANT U.S. ATTORNEY  
CAMDEN, NEW JERSEY  
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